

**UNITED STATES DISTRICT COURT**  
WESTERN DISTRICT OF TEXAS, DEL RIO DIVISION

United States of America

vs.

(1) Joanna Tellez

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§  
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§  
§

CRIMINAL COMPLAINT


CASE NUMBER: DR:22-M -00449(1)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about **February 25, 2022** in **Dimmit** county, in the **WESTERN DISTRICT OF TEXAS** defendant(s) did, conspire with co conspirators and other unnamed co-conspirators, to transport, or move or attempt to transport or move, certain persons, material witness, knowing or in reckless disregard of the fact that that such persons were aliens illegally present in the United States, a felony, in violation of Title **8** United States Code, Section(s) **1324(a)(1)(A)(v)(I)**

I further state that I am a(n) **Border Patrol Agent** and that this complaint is based on the following facts: *"On February 25, 2022 the defendant, Joanna TELLEZ, a United States citizen, was arrested near Carrizo Springs, Texas within the Western District of Texas, for conspiring to transport 1 illegal alien further into the United States. Agents attempted to conduct an Immigration Inspection on a 2016 Toyota Corolla, the sedan failed to yield to agents and led both Border Patrol Agents and*

**Continued on the attached sheet and made a part of hereof.**

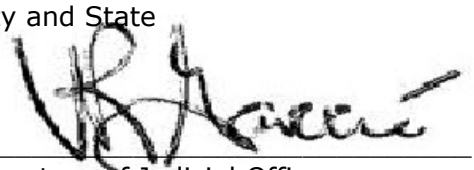
Sworn to before me and subscribed in my presence,

  
\_\_\_\_\_  
Signature of Complainant  
Jester, Michael C  
Border Patrol Agent

03/01/2022  
File Date

at DEL RIO, Texas  
City and State

VICTOR ROBERTO GARCIA  
UNITED STATES MAGISTRATE JUDGE

  
\_\_\_\_\_  
Signature of Judicial Officer

**WESTERN DISTRICT OF TEXAS**

UNITED STATES OF AMERICA

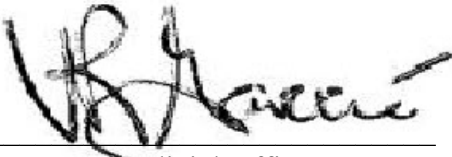
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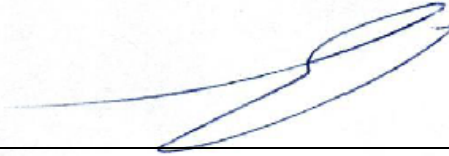
(1) Joanna Tellez

**Continuation of Statement of Facts:**

Dimmit County SO on a chase through residential neighborhoods in Carrizo Springs. TELLEZ was identified as the driver of the vehicle and one other occupant who admitted to being in the trunk of the vehicle. TELLEZ gave a sworn statement which she claimed she conspired with an unknown individual to smuggle illegal aliens for financial gain. She claimed she would be paid \$4,000 to \$6,000 for the smuggling venture."



Signature of Judicial Officer



Signature of Complainant